

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

Oral Argument Requested

**NOTICE OF DEFENDANTS' MOTION TO PARTIALLY EXCLUDE
OPINIONS OF DRS. STEPHEN HECHT AND RAMIN NAJAFI**

PLEASE TAKE NOTICE that on May 1, 2023, or as soon thereafter as counsel may be heard, the undersigned Defendants' counsel, on behalf of all Defendants named below, shall move for an entry of Order partially excluding the opinions of Plaintiffs' experts, Stephen Hecht and Ramin Najafi, pursuant to Federal Rule of Evidence 702.

PLEASE TAKE FURTHER NOTICE that in support of their motion, the undersigned defendants shall rely upon the Memorandum of Law in Support submitted herewith, and any reply submissions made hereafter and the Certification of Jessica Davidson, Esq. together with exhibits; and

PLEASE TAKE FURTHER NOTICE that a proposed Order is submitted herewith; and

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

Dated: March 13, 2023

Respectfully submitted,

By: /s/ Jessica Davidson

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(Admitted to Practice in Maryland and the
District of Columbia; Not Admitted in New
York)

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 13, 2023, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all CM/ECF participants in this matter.

/s/ Jessica Davidson

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